

IN THE
UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor(s): Alan C. Berkema

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Application No.: 09/897,656

Examiner: Poltorak, Piotr

Filing Date: June 29, 2001

Group Art Unit: 2134

Title: PORTABLE WIRELESS DEVICE AND SOFTWARE FOR PRINTING BY REFERENCE

Mail Stop Appeal Brief-Patents
Commissioner For Patents
PO Box 1450
Alexandria, VA 22313-1450

TRANSMITTAL OF APPEAL BRIEF

Sir:

Transmitted herewith is the Appeal Brief in this application with respect to the Notice of Appeal filed on Feb. 13, 2006.

The fee for filing this Appeal Brief is (37 CFR 1.17(c)) \$500.00.

(complete (a) or (b) as applicable)

The proceedings herein are for a patent application and the provisions of 37 CFR 1.136(a) apply.

() (a) Applicant petitions for an extension of time under 37 CFR 1.136 (fees: 37 CFR 1.17(a)-(d) for the total number of months checked below:

() one month	\$120.00
() two months	\$450.00
() three months	\$1020.00
() four months	\$1590.00

() The extension fee has already been filled in this application.

(X) (b) Applicant believes that no extension of time is required. However, this conditional petition is being made to provide for the possibility that applicant has inadvertently overlooked the need for a petition and fee for extension of time.

Please charge to Deposit Account **08-2025** the sum of \$500.00. At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account 08-2025 pursuant to 37 CFR 1.25. Additionally please charge any fees to Deposit Account 08-2025 under 37 CFR 1.16 through 1.21 inclusive, and any other sections in Title 37 of the Code of Federal Regulations that may regulate fees. A duplicate copy of this sheet is enclosed.


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Respectfully submitted,

Alan C. Berkema

By 

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PATENT APPLICATION



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: Alan C. Berkema
Serial No.: 09/897,656
Conf. No.: 9732
Filed: June 29, 2001
For: PORTABLE WIRELESS DEVICE
AND SOFTWARE FOR PRINTING
BY REFERENCE
Art Unit: 2134
Examiner: Poltorak, Piotr

I hereby certify that this paper is being deposited with the United States Postal Service as FIRST-CLASS mail in an envelope addressed to: Mail Stop Appeal Brief- Patents, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on this date.

April 11, 2006

Date

Registration No. 35,132

F-CLASS.WCM

Appr. February 20, 1998 Attorney for Applicant(s)

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Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

APPELLANT'S BRIEF ON APPEAL PURSUANT TO RULE 192

REAL PARTY IN INTEREST

The real party in interest is Hewlett-Packard Development Company, LP, a limited partnership established under the laws of the State of Texas and having a principal place of business at 20555 S.H. 249 Houston, TX 77070, U.S.A. (hereinafter "HPDC"). HPDC is a Texas limited partnership and is a wholly-owned affiliate of Hewlett-Packard Company, a Delaware Corporation, headquartered in Palo Alto, CA. The general or managing partner of HPDC is HPQ Holdings, LLC.

RELATED APPEALS AND INTERFERENCES

A Notice of Appeal was filed January 23, 2006 for U.S. Patent Application Serial No. 09/897,693, and a Notice of Appeal was filed February 6, 2006 for U.S. Patent

04/18/2006 TBESHAH1 00000027 082025 09897656

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Application Serial No. 09/897,647. These Applications are not technically related but disclose related subject matter.

STATUS OF CLAIMS

Claims pending, finally rejected and appealed 4, 5, 9-12, 15, 18-20, 22, 32-34, and 37-39.

STATUS OF AMENDMENTS

No amendments were filed after the final Office Action dated December 13, 2005.

SUMMARY OF CLAIMED SUBJECT MATTER

Claim 4 defines a computer program product, such as that in a portable wireless device 10 (P5, L27-30). The product comprises a computer readable code stored on a computer readable medium (e.g., memory device 21 and temporary memory buffer 23). When executed by a computer (e.g., the portable wireless device), the product causes the computer to wirelessly communicate 30 (e.g., FIG. 3) a reference to a print device 22 (FIGs. 1-3). P7, L13-15. The reference identifies a location 14 (FIG. 1) at which print content is located on a network. P7, L14-15. The reference causes the print device 22 to retrieve the print content from the network and to print the print content. P9, L2-10. The reference communicated to the print device also comprises billing data. P8, L14-15.

Claim 5 also defines a computer program product, such as that in a portable wireless device 10 (P5, L27-30). The product comprises a computer readable code stored on a computer readable medium (e.g., memory device 21 and temporary memory buffer 23). When executed by a computer (e.g., the portable wireless device), the product causes the computer to wirelessly communicate 30 (e.g., FIG. 3) a reference to a print device 22 (FIGs. 1-3). P7, L13-15. The reference identifies a location 14 (FIG. 1) at which print content is located on a network. P7, L14-15. In claim 5, the reference also identifies the

location of a print service 16 (FIG. 1). P7, L28-30. This print service is adapted to retrieve print content from the network and format the retrieved print content for printing. P7, L29-30; P9, L7-10.

Claim 9 defines a computer program product, such as that in a portable wireless device 10 (P5, L27-30). The product comprises a computer readable code stored on a computer readable medium (e.g., memory device 21 and temporary memory buffer 23). When executed by a computer (e.g., the portable wireless device), the product causes the computer to wirelessly communicate 30 (e.g., FIG. 3) a reference to a print device 22 (FIGs. 1-3). P7, L13-15. The reference identifies a location 14 (FIG. 1) at which print content is located on a network. P7, L14-15. The reference causes the print device 22 to retrieve the print content from the network and to print the print content. P9, L2-10. According to claim 9, the computer readable code further causes the computer to wirelessly communicate a security access code to the print device P7, L25-28. This security access code may be supplied with the reference. P7, L25-28. According to dependent claim 11, the security access code enables access to the print content. P7, L27-28.

Claim 15 defines a computer program product, such as that in a portable wireless device 10 (P5, L27-30). The product comprises a computer readable code stored on a computer readable medium (e.g., memory device 21 and temporary memory buffer 23). When executed by a computer (e.g., the portable wireless device), the product causes the computer to wirelessly communicate 30 (e.g., FIG. 3) a reference to a print device 22 (FIGs. 1-3). P7, L13-15. The reference identifies a location 14 (FIG. 1) at which print content is located on a network. P7, L14-15. The reference causes the print device 22 to retrieve the print content from the network and to print the print content. P9, L2-10. As further defined in claim 15, the computer readable code further causes the computer to wirelessly communicate a discovery signal (steps 39, 41, FIG. 4) to the print device. P11, L27 – P12, L3. A responsive signal (step 43, FIG. 4) from the print device identifies one or more print capabilities of the print device. P12, L20-26. “Print capabilities” are capabilities of the responsive print device 22. P12, L20-22. For example, information

such as whether the print device has color printing capabilities, whether the print device is equipped for printing specialized graphic files, and/or the costs associated with using the print device to print a document. P12, L22-26.

Claim 18 defines a computer program product, such as that in a portable wireless device 10 (P5, L27-30). The product comprises a computer readable code stored on a computer readable medium (e.g., memory device 21 and temporary memory buffer 23). When executed by a computer (e.g., the portable wireless device), the product causes the computer to wirelessly communicate 30 (e.g., FIG. 3) a reference to a print device 22 (FIGs. 1-3). P7, L13-15. The reference identifies a location 14 (FIG. 1) at which print content is located on a network. P7, L14-15. The reference causes the print device 22 to retrieve the print content from the network and to print the print content. P9, L2-10. According to claim 18, the computer readable code further causes the computer to add information to the reference before wirelessly communicating the reference to the print device. P7, L24-26. This information comprises a locator identifying a location of a print service. P7, L28-30.

Claim 19 defines a computer program product, such as that in a portable wireless device 10 (P5, L27-30). The product comprises a computer readable code stored on a computer readable medium (e.g., memory device 21 and temporary memory buffer 23). When executed by a computer (e.g., the portable wireless device), the product causes the computer to wirelessly communicate 30 (e.g., FIG. 3) a reference to a print device 22 (FIGs. 1-3). P7, L13-15. The reference identifies a location 14 (FIG. 1) at which print content is located on a network. P7, L14-15. The reference causes the print device 22 to retrieve the print content from the network and to print the print content. P9, L2-10. Claim 19 also defines causing the computer to add information to the reference before wirelessly communicating the reference to the print device. P7, L24-26. This information, according to claim 19, comprises a security access code. P7, L26-28.

Claim 20 defines a computer program product, such as that in a portable wireless device 10 (P5, L27-30). The product comprises a computer readable code stored on a computer readable medium (e.g., memory device 21 and temporary memory buffer

23). When executed by a computer (e.g., the portable wireless device), the product causes the computer to wirelessly communicate 30 (e.g., FIG. 3) a reference to a print device 22 (FIGs. 1-3). P7, L13-15. The reference identifies a location 14 (FIG. 1) at which print content is located on a network. P7, L14-15. The reference causes the print device 22 to retrieve the print content from the network and to print the print content. P9, L2-10. According to claim 20, the computer readable code further causes the computer to add information to the reference before wirelessly communicating the reference to the print device. P7, L24-26. This information comprises billing information. P8, L14-15.

Claim 22 defines a computer program product, such as that in a portable wireless device 10 (P5, L27-30). The product comprises a computer readable code stored on a computer readable medium (e.g., memory device 21 and temporary memory buffer 23). When executed by a computer (e.g., the portable wireless device), the product causes the computer to wirelessly communicate 30 (e.g., FIG. 3) a reference to a print device 22 (FIGs. 1-3). P7, L13-15. The reference identifies a location 14 (FIG. 1) at which print content is located on a network. P7, L14-15. The reference causes the print device 22 to retrieve the print content from the network and to print the print content. P9, L2-10. According to claim 22, the computer readable code further causes the computer to add information to the reference before wirelessly communicating the reference to the print device. P7, L24-26. The computer is caused to communicate a request for status information to the print device (e.g., step 32; P9, L13-15) and receive status information from the print device (e.g., step 33; P9, L15-17).

Claim 32 defines a portable wireless device 10 (FIG. 2). P4, L27-29. The device comprises a communication interface 18 (e.g., an RF interface) adapted to enable wireless communication between the portable wireless device and a print device. P5, L12-16. A processor 19 is coupled to the communication interface 18, which is adapted to cause the communication interface to wirelessly communicate (e.g., step 30) a reference to the print device. P5, L27- P6, L5; P7, L13-15. The reference identifies the location of a print content on a network (P7, L14-15), and causes the print device to use the reference to retrieve the print content from the network and to print the print content.

P9, L2-10. The processor 19 is further adapted to cause the communication interface 18 to communicate a security access code to the print device. P7, L24-28; P13, L26 – P14, L3. As further defined in claim 34, the security access code enables access to the print content. P7, L26-28.

Claim 37 defines a portable wireless device 10 (FIG. 2). The device comprises a first communication interface (e.g., RF interface 18) adapted to enable communication between the portable wireless device and a print service 16. P18, L22-24; P19, L10-12; FIGs. 9A-9B. The device further comprises a second communication interface (e.g., also via RF interface 18) adapted to enable wireless communication between the portable wireless device and a print device 22. FIGs. 9A-9B; P19, L12-26. A processor 19 (FIG. 2) is coupled to the first communication interface, and is adapted to cause the first communication interface to communicate a reference 116 that identifies the location of a print content to the print service 16. FIGs. 9A-9B; P18, L25-28. Communicating the reference to the print service causes the print service to retrieve the print content from a network (P18, L26-28) and further causes the print service to transmit 118B the print content to the portable wireless device. P18, L28-30; P19, L11-12; FIGs. 9A-9B.

ISSUES TO BE REVIEWED ON APPEAL

1. The 35 U.S.C. §102(b) rejection of claims 5, 15, and 18 as being anticipated by Larsson.
2. The 35 U.S.C. §103(a) rejection of claims 4 and 20 as being unpatentable over Larsson in view of Saylor.
3. The 35 U.S.C. §103(a) rejection of claims 9-10, 12, 19 and 32-33 over Larsson in view of Takahashi.
4. The 35 U.S.C. §103(a) rejection of claims 11 and 34 as being unpatentable over Larsson in view of Takahashi and in further view of Yoon.

5. The 35 U.S.C. §103(a) rejection of claim 22 as being unpatentable over Larsson in view of Ochiai.

6. The 35 U.S.C. §103(a) rejection of claim 22 as being unpatentable over Larsson in view of Bhogal.

7. The 35 U.S.C. §103(a) rejection of claims 37-39 as being unpatentable over Larsson.

ARGUMENT

I. The 35 U.S.C. §102 Rejection of Claims 5, 15, and 18 as Anticipated by Larsson.

A. The Anticipation Rejection of Claim 5 Based on Larsson Should be Reversed, as the Print Request in Larsson Fails to Teach or Suggest Wirelessly Communicating a Reference to a Print Device Identifying Both a Location at Which Print Content is Located on a Network and a Location of a Print Service.

Claim 5 currently stands rejected under 35 U.S.C. §102(b) as being anticipated by Larsson. Claim 5 requires, among other things, a computer that is caused to “wirelessly communicate a reference to a print device, the reference identifying a location at which a print content is located on a network and the location of a print service” (emphasis added). Thus, claim 5 requires that a reference specify locations of both the print content and the print service. This permits the reference to identify an adequate print service that the printer can use to resolve a print by reference operation. For example, in an application of the invention of claim 5, a reference could specify an appropriate print service for formatting of content in the case where the content and the formatting for the particular printer are not available from the same source.

Larsson fails to teach or suggest communicating a reference specifying both a location of print content and the location of a print service. The Examiner cites (December 13, 2005 Office Action, ¶46) a print service device 210 in Larsson provided with means 212 for receiving a request for a document to be printed. This request, according to the Examiner, comprises a document address, indicating where the document is situated (P16, L5-9). The request is passed from the means 212 for receiving a request to a control means 214. The control means 214 then extracts a document address from the request and passes it on to a means for retrieving documents 216. The means for retrieving documents 216 then retrieves the document from the specified address within a memory 230 that the information provider has access to. The memory 230 is a storage memory of the information service provider. P16, L 13-22. The Examiner states (¶47) that this reads on the claimed feature that the reference identifies “a location at which a print content is located on a network, and the location of a print service”.

However, the steps cited by the Examiner fail to teach or suggest communicating a reference that includes both a location of print content and a location of a print service. Instead, what is communicated to the print service device (P14, L5-24) is the location of a document address and a printer specification (P10, L16-18; P13, L33-36; P16, L7-9). A printer specification includes the transport route for a print file to be printed (the destination printer; see, e.g., P4, L25-28), and the characteristics of the printer (manufacturer, model, etc.) (P14, L1-3; P16, L10-13; P19, L7-23). However, the printer specification sent from the communication device does not include the location of a print service.

B. Larsson Teaches Away From Wirelessly Communicating a Reference to a Print Device Identifying Both a Location at Which Print Content is Located on a Network and a Location of a Print Service, as Defined in Claim 5, Because Larsson's Print Service is Part of an Information Service Provider.

In Larsson, the communication device 300, 300a, 300b searches or selects information by accessing an information service provider 200 (P7, L34 – P8, L3; P13, L33 – P14, L1). A separate location of a print service is not necessary in Larsson, as the print service is part of the information service provider. See, e.g., P13, L15-22; P21, L7-11.

Particularly, in Larsson, the print service 210 identified by the Examiner is always part of the information service provider, though it can be “positioned externally from the information service provider”. See, e.g., Larsson, P13, L15-18. As clearly illustrated in any of the embodiments in FIGs. 1-4 of Larsson (the “different communication implementations” (P14, L25-26)), the print service device 210 (also 210a-210c), is part of an information service provider 200 (also 200a-200c). The printer service device (also referred to in Larsson as a “device that handles presentation requests”) is a module in an information service provider (P8, L33), and preferably is implemented as software code executed in the information service provider (P13, L18-22). This allows, according to Larsson, the print service device to share functionality and interfaces with the information service, and to maintain security (P8, L30-36).

The print service device 210 “is a device that handles the request of a document to be printed” (P13, L18-20). If the information service provider lacks formatting information for the particular printer being used in a print by reference operation, that printer will not be able to be used for the presentation contemplated in Larsson's system beginning with a PDA 100. By contrast, the invention defined in claim 5 permits the print by reference operation to address a print service and content that are in

different locations. The content is retrieved and the print service is used to format the information for printing, for example.

C. The Anticipation Rejection of Claim 15 Based on Larsson Should be Reversed, as Larsson Neither Teaches nor Suggests a Responsive Signal to a Discovery Signal That Identifies One or More Print Capabilities of a Print Device.

Claim 15 requires, among other things, “wirelessly communicating a discovery signal” and that a “responsive signal further identifies one or more of the print capabilities of the print device”. As described in the present application (see, e.g., FIG. 4), a wireless device 10 may transmit discovery signals (P11, L27-30), and the responsive signals to this discovery signal may include print capabilities. P12, L20-22. Print capabilities are defined in the present application as “information pertaining to the capabilities of the responsive print device 22. For example, the responsive signals may include information specifying whether the print device has color printing capabilities, whether the print device is equipped for printing specialized graphic files and further specifying the costs associated with using the print device 22 to print a document” (for example, if the printer is set up as a pay for print service) (P12, L21-26). In the case where there are multiple printers within range of a wireless device, this permits the selection of an appropriate printer by any number of capabilities that the printer might include in its responsive signal. P12, L26-29.

Larsson contemplates no transmission of such printer capabilities. The Examiner states (December 13, 2005 Office Action, ¶48) that Larsson teaches wirelessly communicating a discovery signal (from a telephone) to a print device and receipt of a responsive signal identifying a print device within the reach of and compatible with a requesting device (P 20, L15 - P21, L11) and that the print device provides the requesting device with the printer’s specification.

However, this statement is not faithful to the actual teachings of Larsson, which are inconsistent with the examiner's conclusions. Larsson does not teach that the signal sent from the telephone 100 in this cited section, a broadcast identity request (step 524, FIG. 8), is responded to by a signal including printer capabilities. The request in this cited section is for "a printer having a Printer Server according to a preferred embodiment of the invention" (P19, L32-35). Any response to this signal is merely that a communication device 300 is available (i.e., a network capability) (P20, L34-36), not print capabilities. Once a communication device is selected, a request is sent for a printer specification (P21, L2-4), and a returned printer specification is sent to a print service device 210 of an information service provider (P21, L5-11).

D. The Examiner, in Rejecting Claim 15, Relies on a Construction of "Print Capabilities" that is Unreasonably Broad, as the Term Would be Understood by an Artisan Having Reference to the Present Application.

The Examiner alleges (December 13, 2006 Office Action, ¶6), "the printer in Larsson's invention does have the capability to receive, understand, generate and send a response information signal to a request (col. 20, lines 25-22) from a requesting device. This by itself reads on print capability." However, the ability to send a responsive signal does not itself teach that the responsive signal identifies one or more print capabilities of a print device. This is why claim 15 defines more than merely a "responsive signal".

Further, the Examiner states (¶8), "the claim language limitation allows an even broader interpretation of the abbreviated definitions cited in the specification, and examples are only examples and not definitions of terms", further stating "although the claims are interpreted in light of the specification, limitations from the specification are not read into the claims." However, the broadest reasonable interpretation of the claims to be given during examination by the USPTO must be consistent with the interpretation

that those skilled in the art would reach. *In re Cortright*, 165 F.3d 1353 (Fed. Cir. 1999). Claim terms must be given the definition indicated in the specification and the claim. *Vitrionics Corp. v. Conceptronic, Inc.*, 90 F.3d 1576, 1585 (Fed. Cir. 1996). Claim terms are presumed to have the ordinary and customary meanings attributed to them by those of ordinary skill in the art. *Sunrace Roots Enter. Co. v. SRAM Corp.*, 336 F.3d 1298, 1302 (Fed. Cir. 2003). “The ordinary and customary meaning of a claim term to one of ordinary skill in the art may be ascertained from a variety of sources, first, as *Vitrionics* instructs, from the intrinsic evidence of record such as the claims themselves, the written description, and the prosecution history, but also from the ‘common understanding’ of the terms that may be reflected in dictionaries, encyclopedias, and treatises.” *W.E. Hall Co., Inc. v. Atlanta Corrugating, LLC*, 370 F.3d 1343, 1350 (Fed. Cir. 2004) (citation omitted).

The term “print capabilities” as would be construed by an artisan having reference to the present specification means something more than “the capability to receive, understand, generate and send a response information signal” (December 13, 2005 Office Action, ¶6). “Print capabilities” as used in the present application are just that: capabilities for printing a document (P12, L20-26). Examples of information relating to print capabilities provided in the present specification include “information specifying whether the print device 22 has color printing capabilities, whether the print device 22 is equipped for printing specialized graphic files and the costs associated with using the print device 22 to print a document.” (P12, L22-26). A capability to “send a response information signal” to a request is not a capability for printing a document. Neither is the mere capability to communicate with a print service according to the invention of Larsson (P19, L35-38).

The Examiner also cites P13, L29-33, and submits (¶7) that Larsson “explicitly teaches that the main task of the communication device 300a, b is to provide a cellular telephone with a printer specification.” However, even assuming only for the sake of argument that such a printer specification includes print capabilities, Larsson also explicitly teaches that any printer specification supplied from the communication device

300a, b to a cellular telephone is provided in response to a request for such information once a printer has been selected, not in response to a discovery signal (P21, L1-6: “When one communication device 300 is selected, the telephone sends a request to the selected communication device 300 for a printer specification, step 534. The communication device returns a printer specification which is received at the telephone 100, step 536” (emphasis added)).

E. The Anticipation Rejection of Claim 18 Based on Larsson Should be Reversed, as Larsson Fails to Teach or Suggest Adding a Locator Identifying a Location of a Print Service to a Reference, Because the Print Service in Larsson is Part of an Information Service Provider.

Claim 18 requires, among other things, “causing a computer to add information to a reference before wirelessly communicating the reference to the print device, wherein the information added to the reference comprises a locator, the locator identifying a location of a print service.” Thus, there are two locations required in the reference defined in claim 18. One location is “a location at which a print content is located on the network”. The second, added location is “a locator, the locator identifying a location of a print service.” The reference includes both locations “before wirelessly communicating a reference to the print device”. This permits, for example, the reference to identify a print service that can be used to format referenced content for printing on the particular printer used for a print by reference operation. This will work in the case where the content is with a source that does not provide such formatting information or the printer does not include drivers for such information.

The Examiner cites P16, L5-9 and L13-32 of Larsson as teaching “a location at which a print content is located on a network, and the location of a print service” (December 13, 2005 Office Action, ¶¶46-47). However, Larsson fails to teach or suggest adding a locator, identifying a location of a print service, to a reference as defined. The cited portions refer only to enabling printing from specialized information

service providers (ISPs) 200, 200a, 200b, 200c, that each have print service devices 210, 210a, 210b, 210c (see also FIGs. 1-4; P13, L15-22). Particularly, in Larsson, a reference includes a document address and a printer specification (P16, L7-9). The printer specification includes information regarding how to send the print file to the printer and the manufacturer and model of the printer (P16, L9-13), not a location of a print service.

All of the portions cited by the Examiner discuss the operations performed by the print service device 210 that is part of Larsson's ISPs 200. In Larsson's system, it is assumed (P8, L28-36; P10, L16-22; P13, L18-23) that the information service provider has a print service (aka "device that handles presentation requests") that will format information for printing. That assumption greatly limits the applicability of Larsson's presentation system. There is no discussion that the reference that is transmitted to the print device in Larsson specifies the location of a print service, as described above regarding claim 5, which remarks are incorporated herein.

F. The Examiner's Alternative Argument Recognizes that the Print Service in Larsson is Part of its Information Service Provider, but it Ignores that Claim 18 Requires Adding the Location of the Print Service to a Reference Already Including the Location of Print Content.

The Examiner further alleges (December 13, 2005 Office Action, ¶10), "As it is clear from the reference a computer wirelessly communicates a reference to a print device that comprises a content location (pg. 13 lines 11-15 and 33-35) and the reference causes the print device to contact a print service (pg. 13, lines 36-37) that has the same location of the content (page 16, lines 13-22). Thus the reference identifies the location of the content as well as the print service location".

Though the Examiner at least admits by this statement that the print service in Larsson is actually part of the information service provider, this alternative argument requires that a single item in a reference "identifies the location of the content as well as

the print service location”. However, claim 18 clearly requires that the locator identifying a location of a print service is added to the reference that identifies a location at which a print content is located on a network (claim 18, L8-12), thus providing two locations. If the content location is the same as the print service location, there is no reason to add such a locator (and Larsson indeed fails to teach or suggest that such a locator is added). Thus, even taking the Examiner’s statement as true for the sake of argument, Larsson still fails to teach or suggest all of the features of claim 18, and lacks many of the benefits provided by such an invention.

II. The 35 U.S.C. §103(a) Rejection of Claims 4 and 20.

A. The Rejection of Claims 4 and 20 as Obvious Based on Larsson and Saylor Should be Reversed, as Saylor, Directed to Accessing Voice Content, Adds No Suggestion to Wirelessly Communicate A Reference Comprising Both a Location at Which Print Content is Located on a Network and Billing Data.

Claim 4 requires, among other things, causing a computer to “wirelessly communicate a reference to a print device, the reference identifying a location at which a print content is located on a network...wherein the reference further comprises billing data.” Claim 20 requires, among other things, causing a computer to “wirelessly communicate a reference to a print device, the reference identifying a location at which a print content is located on a network” and causing “the computer to add information to the reference before wirelessly communicating the reference to the print device, wherein the information added to the reference comprises billing information.”

The Examiner admits (December 13, 2005 Office Action, ¶51) that Larsson does not teach adding billing information to a reference. However, the Examiner cites Saylor, C31, L1-7, for this teaching. The Examiner then concludes (¶52), “[I]t would

have been obvious to one of ordinary skill in the art at the time of applicant's invention to add billing information to the reference as taught by Saylor et al. for the benefit of properly charging users for the accessed content (Saylor et al., col. 39 lines 44-49 and col. 27 lines 42-46)."

However, though there is a billing module described in C31 of Saylor, it has absolutely nothing to do with a reference by which content may be printed for pay. It also does not discuss billing information being passed in any reference used to initiate a print (or any other operation, for that matter). Saylor, in fact, has nothing to do with print operations of any sort, or with presentation operations.

The brief portion cited in C31, L1-7 discusses how a billing module 46 receives billing information specific to a "VPage" (Saylor, C31, L4-6). A VPage "consists of voice content and a means of structuring it" (C2, L6-8). The user must have a prior account with a VCode (short for "Voice Code": C1, L14) registration system (C5, L40-61; C32, L57-60; FIG. 8). The purpose of the VPage and VCode system in Saylor is allow a user to access stored content by telephone by entering a VCode or verbally describing an object, attraction, or subject (C1, L14-21).

The reference in claims 4 and 20, on the other hand, is a reference from the computer that wirelessly communicates with a print device, and would not, for example, require that a previous account have been established (though such scenario is not excluded). This is also a communication that requests a print service from a printer. The billing module in C31 of Saylor does not provide any suggestion to send a reference wirelessly to a printer that includes billing information in the reference (see, e.g., C31, L16-18: "Through the use of the present system, voice and other content may be delivered on demand to users...without sitting at a computer").

The additionally cited portions of Saylor do not add any significant teaching with regard to claims 4 and 20. C39, L44-49 refers to entry of a VCode for retrieving voice content (from newspaper content). C27, L42-46 refers to charging a user for accessing a system for VPages (i.e., "voice pages"). Thus, there is no teaching in the

cited portions of Saylor for adding billing information to a reference to a print device, as claimed.

B. The Examiner's Stated Motivations for Combining Larsson and Saylor Unreasonably Group Together Differing Applications of Accessing Restricted Content Delivery, and Overlook the Clear Teachings of Saylor.

The combination of Larsson and Saylor is also inappropriate. An artisan would not have been motivated to modify Larsson with the teachings of Saylor. The Examiner's alleged motivation is stated to be "for the benefit of properly charging users for the accessed content" (December 13, 2005 Office Action, ¶52). A problem with this stated reason is that the claims are not directed to a general idea of pay for content, of which a book purchase, for example, is an old example that fits the generalizations used to support the rejection. Such broad generalizations do not comport with the specificity necessary to combine the highly unrelated teachings of Larsson and Saylor. That content has been paid for in the past does not render every development that results in content delivery obvious. In any event, the claims are more concerned with a pay for print service, as the print reference includes billing data (claims 4 and 20). Saylor, on the other hand, is not directed to accessing print content.

The Examiner submits (December 13, 2005 Office Action, ¶16) "that the main purpose of providing applicant with Saylor's reference was to accommodate the missing capabilities of Larsson's invention and not to duplicate them." This strongly suggests an attempt at hindsight reconstruction of the invention. The Examiner further submits (¶19), "Saylor's reference clearly shows that information is a valuable commodity and as a result it would have been obvious to one of ordinary skill in the art at the time of applicant's invention to add billing information to the reference as taught by Saylor for the benefit of properly charging users for the accessed content (Saylor et al., col. 39, lines 44-49 and col. 27, lines 42-46)".

These additional statements again suggest that a teaching of paying for content would render every system, method, application, etc. of accessing restricted content obvious. The inventions defined in claims 4 and 20 require that billing data (information) is added to a reference that already identifies a location at which print content is located on a network. This is more specific than simply stating that one may want to pay for content. It is also significantly different than dialing a telephone, entering a code, and listening to restricted content, as disclosed in Saylor (C31, L36 - C32, L22).

III. The 35 U.S.C. §103(a) Rejection of Claims 9-10, 12, 19, and 32-33.

A. The Rejection of Claims 9-10, 12, 19, and 32-33 Should be Reversed, as the Secondary Reference Cited by the Examiner, Takahashi, is Not Directed at All to Printing by Reference, or to Security for a Print by Reference Operation.

Independent claims 9, 19, and 32 define wirelessly communicating a security access code to a print device. Particularly, claim 9 requires, among other things, causing a computer to “wirelessly communicate a security access code to the print device.” Claim 19 requires that a computer readable code “causes the computer to add information to the reference before wirelessly communicating the reference to the print device, wherein the information added to the reference comprises a security access code.” Claim 32 requires that a processor is “further adapted to cause the communication interface to communicate a security access code to the print device.” Applicants submit that neither Larsson nor Takahashi teach or suggest these features.

The Examiner recognizes (December 13, 2005 Office Action, ¶55) that Larsson fails to teach that a computer interface communicates a security access code to a print device. Takahashi (¶83) is cited for this deficiency. The Examiner alleges (December 13, 2005 Office Action, ¶56), “It would have been obvious to one of ordinary

skill in the art at the time of applicant's invention to communicate a security access code to the print device enabling usage of the print device as taught by Takahashi... in order to improve the print security function (Takahashi, [05]) and avoid waste printing (Takahashi, [2] and [84]-[86])." Further, the Examiner states (¶56), "Takahashi teaches that the printing is not executed as long as a person with print authority is identified (Takahashi [83]) and as a result it would have been obvious to one of ordinary skill in the art at the time of applicant's invention to implement a challenge from the print device if the request were provided without a security access code. One of ordinary skill in the art would have been motivated to perform such a modification in order to print content by providing an appropriate security access code."

However, the cited paragraphs in Takahashi merely describe that fingerprint security permits security among multiple computers to share a printer such that the printer authenticates a fingerprint with respect to the connected computer that sent it (e.g., see ¶ 83: "the printer 4B authenticates an operator"). This has nothing to do with printing by reference, and is a limited, specific application of fingerprint security.

Particularly, Takahashi's system is a fingerprint identification authentication system for protecting unauthorized access to documents (print results) that are printed out from a printer (Takahashi, Abstract). According to Takahashi, a computer uses fingerprints to control the access to print information (see, e.g., FIG. 3; ¶5). There is absolutely no discussion of a print by reference operation, let alone the wireless initiation of a print by reference operation with a print device. Takahashi addresses a completely different problem: an operator having to stand by a printer to wait for print results, to prevent an already-retrieved (and sent for print) document from being read by others when it is printed (¶2). The Examiner's cited combination simply does not teach the features that are in the claims.

In claims 9, 19, and 32, the security access code is sent along with the reference (and in claim 19, in the reference) to initiate a print operation via a wireless medium (claim 9, L8-9; claim 19, L8-12; claim 32, L10-11). This permits, for example, printers in commercial settings to be used by users having paid a subscription fee or

otherwise having paid for access, for example. It also permits, for example, employees of a company having a security access code to visit another company location and initiate the print by reference operation with a printer at the location.

Further, in claims 9, 19, and 32, the reference is sent to a print device (claim 9, L9; claim 19, L8-12; claim 32, L11), whereas in Takahashi there is a computer that is controlling the access (Takahashi, FIG. 1; ¶ 48). The invention of Takahashi protects an individual printer or computer from unauthorized access of a particular printed document. In sum, Takahashi has little to do with the particular scheme for security access that is contemplated by the print by reference operation in the claims.

B. The Examiner's Stated Motivations for Combining the Teachings of Takahashi and Larsson Fail to Account for the Completely Different Purposes of the Two References, and Fail to Suggest How Larsson Would be Modified to Teach the Features of Claims 9, 19, and 32.

The Examiner submits (December 13 Office Action, ¶25, citing July 14, 2005 Office Action, ¶21) that Takahashi was cited to address a computer interface communicating a security access code enabling usage of a print device, and cites paragraphs, 83-86 to teach a motivation to combine Takahashi with Larsson. However, an artisan would not be motivated to combine the references. The user of a wireless device, such as a PDA, is likely to keep the PDA on the person. The wireless device 100 in Larsson does not have the same security concerns as the personal computer and printer of Takahashi (see, e.g., Takahashi, ¶2). If Larsson were modified by Takahashi, as suggested by the Examiner, the wireless device 100 in Larsson would require a fingerprint operation for access of a device and/or a printer. This still does not result in the claimed invention, as it does not teach or suggest wirelessly communicating a secure access code to a print device with a reference identifying a location of print content. Further, with

regard to claim 19, it does not suggest communicating any information in a reference for printing, and an artisan would not be motivated to make such a modification.

Regarding paragraphs 83-86 cited by the Examiner for “motivation”, all of these paragraphs are directed to security of a particular document (a print result) that has already been obtained and sent for printing to a particular printer on a network (see, e.g., ¶83), not for restricting access for printing a document in a print by reference operation.

IV. The 35 U.S.C. §103(a) Rejection of Claims 11 and 34.

A. The Rejection of Claims 11 and 34 as Obvious over Larsson, Takahashi, and Yoon Should be Reversed, as There is No Motivation to Modify Larsson or Takahashi According to Yoon to Teach That a Security Code Enables Access to Print Content Retrieved By a Reference.

Dependent claims 11 and 34 further define, among other things, that “the security access code enables access to the print content” (claim 11, L2; claim 34, L2). The Examiner recognizes (December 13, 2005 Office Action, ¶59) that neither Larsson nor Takahashi teach communicating a security access code to a print device enabling access to print content, and cites Yoon (internet content, abstract). The Examiner then concludes, “[I]t would have been obvious...to send access code enabling access to the print content as taught by Yoon...in order to allow access to fee-based content and determine the charges for the content usage (Yoon et al. col. 1, lines 45-60).”

However, this does not suggest any particular modification of Larsson (or Larsson in view of Takahashi, for that matter). Yoon, in contrast to Larsson, provides a web info shop (Yoon, Abstract). Yoon controls access to the web info shop and provides mechanisms for charging for usage of the web info shop (C2, L1-8). In claims 11 and 34, by contrast, the security access code is transmitted wirelessly along with a print by

reference operation, and it enables access to print content that is at the network location specified by the reference.

Yoon discloses an interactive system where a response and authentication feature is used to allow access to a web info shop service (see, e.g., FIG. 3). It is not at all clear how this can be used to modify Larsson's system. It is also not clear what this has to do with the communication of a security code that allows access to print content that is addressed in a print by reference operation.

Further, the user identification and password in Yoon is to allow use of a charged content provider (C1, L46-49). In Takahashi, the fingerprint security is for protecting a print result from an already-retrieved document from being seen by others at a particular printer (Takahashi, ¶83). These are completely different security purposes. Thus, there appears to be no motivation for combining these references as well.

Generally, with regard to these combinations, the substitution of references evinces what Applicants believe is a hindsight reconstruction of the invention using the claims as a roadmap. The references used to modify Larsson have nothing to do with print by reference operations. The references only vaguely relate to some general billing and security issues in completely different systems. None of the references are concerned with or address particular problems raised by print by reference operation, and their teachings appear largely incompatible. No artisan would have been motivated to look to different references without having the roadmap provided by the features of the claimed invention as set forth in the present claims and application.

V. The Rejection of Claim 22 under 35 U.S.C. §103(a) in View of Larsson and Ochiai.

A. The Rejection of Claim 22 As Obvious Over Larsson and Ochiai Should be Reversed, as Ochiai and Larsson are Directed to Two Different Printing Methods, and Thus There is No Motivation to Modify Larsson According to Ochiai as Suggested by the Examiner.

Claim 22 defines, among other things, a code that “causes the computer to add information to the reference before wirelessly communicating the reference to the print device.” Claim 22 also defines that a computer is caused to “communicate a request for status information to the print device; and, receive status information from the print device.” The Examiner recognizes (December 13, 2005 Office Action, ¶63) that Larsson does not teach a request in response for/to status information, but cites Ochiai for teaching requests (and response) for status information (C18, L6-16). The Examiner submits (December 13, 2005 Office Action, ¶63) that it would have been obvious to communicate a request (and response) for status information as taught by Ochiai “in order to be able to monitor a print job”.

However, claim 22 defines that the computer that wirelessly communicates a reference identifying a location at which a print content is located on a network is also caused to add information to the reference before communicating the reference. This information includes a request for status. Col. 8 of Ochiai, on the other hand, defines a network protocol for a standard network having computers and printers (Abstract). Print jobs are sent in standard network fashion (C4, L57-64). Status information is communicated (C4, L61), but no suggestion is made to include a status request with a reference that identifies a location at which a print content is stored.

The generality of the rejection (and stated motivation) fails to comport with the language of the claim, and fails to provide how Larsson would be modified. The stated motivation is also inappropriate. Ochiai is concerned with a network that has

logically allocated printers, where it may be difficult for a user to determine the physical location of a printer being accessed (C1, L26-30). Larsson, on the other hand, permits mobile printing (see, e.g., Abstract) where the user would be standing in the wireless range of the printer being used for printing. Ochiai does not suggest a need for “monitoring the print job” in such a case, and there is no basis in either reference to support the motivation stated by the Examiner.

The Examiner submits (December 13, 2005 Office Action, ¶35), “obviousness can be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either in the references themselves or in the knowledge generally available to one of ordinary skill in the art.” However, the motivations cited by the Examiner, especially those grounded in “the knowledge generally available to one of ordinary skill in the art”, are extremely general (much more so, for example, than the teachings cited in any of the references), and are unaccompanied by any suggestion for how to modify Larsson to teach specific claimed features. The “knowledge generally available to one of ordinary skill in the art” that billing and security are desirable things does very little to suggest to an artisan to add a status request to a wireless communication in a print by reference operation.

VI. The 35 U.S.C. §103(a) rejection of claim 22 based on Larsson in view of Bhogal.

A. The Rejection of Claim 22 As Obvious Over Larsson and Bhogal Should be Reversed, as Bhogal Fails to Teach or Suggest Any Motivation to Modify Larsson for Communicating a Request for Status Information to a Print Device and Receiving Status Information From the Print Device.

Claim 22 also stands rejected as obvious over Larsson and Bhogal. The Examiner again recognizes (December 13, 2005 Office Action, ¶66) that Larsson fails to teach a request and response for/to status information, but cites Bhogal for teaching a request and response for/to status information (Bhogal et al., 8). The Examiner concludes (¶66), “It would have been obvious to one of ordinary skill in the art at the time of applicants’ invention to add a request and respond for/to status information as taught by Bhogal...in order to be notified of a print job status (Bhogal et al., 8)”.

Bhogal concerns “operating system software for printing documents” (Bhogal, ¶2). Bhogal permits “displaying the print jobs in a scheduled print order, rescheduling the print jobs in a second scheduled print order, and printing the print jobs in the second scheduled print order. Preferably, the print jobs are rescheduled in response to commands initiated by a user, such as the user prioritizing the print jobs. It is also preferred for the plurality of print jobs to be generated by using one or more application programs running in a computer that is in communication with one or more printers. The method may further comprise spooling the plurality of print jobs onto a storage device of a computer to form a scheduled print order.” (¶10).

However, this has nothing to do with print by reference operations, or the wireless initiation of print jobs. In Larsson, the presentation device 100 communicates with the printer (see. e.g., FIG. 1), and nothing in Bhogal suggests modifying the reference used to initiate print by reference in Larsson. Bhogal, instead, is concerned with a standard PC/printer model that might have multiple print jobs (Bhogal, ¶18).

VII. The 35 U.S.C. §103(a) rejection of claims 37-39.

A. The Rejection of Claims 37-39 as Obvious Over Larsson Should be Reversed, as Larsson Fails to Teach or Suggest a Portable Device Having An Interface That Communicates With a Printer and Another Interface That Communicates With a Print Service.

Claim 37 requires, among other things, “a portable device” having “a first communication interface adapted to enable communication between the portable wireless device and a print service” and “a second communication interface adapted to enable wireless communication between the portable wireless device and a print device.” Larsson fails to teach or suggest these features.

The Examiner submits (December 13, 2005 Office Action, ¶68) that Larsson teaches “a communication device (300) comprising a first communication interface adapted to enable wireless communication between a communication device and a print service (60) and a second communication interface adapted to enable wireless communication between the wireless device and a print device (380)”. However, to justify this statement, the only true portable, “wireless device” (telephone 100, see FIG. 1) of Larsson is ignored because it clearly lacks an interface to communicate with a print service as required by the claims. Instead, the Examiner turns to the communication device 300 of the printer in an attempt to compare it to the claims. This is improper and ignores the clear teachings of Larsson.

In Larsson, communication device 300 connects printers 380 to a network 10. An example of such a communication device 300 is a print server (Larsson, P13, L23-25). This communication device does not “wirelessly communicate with a print device.” It is connected to the printer, either as an external device, an internal device, or as an embedded device (P13, L25-28). Though the communication device is capable of

short-range wireless communication, this is for wireless communication with the telephone 100 (the actual portable, wireless device in Larsson), not with a print device, or with a print service (P13, L4-6, L33-37).

Claim 37 sets forth a portable device having two interfaces, where the second wirelessly communicates with a printer (a print device) and the first with a print service. The only thing in Larsson that is properly compared to the claimed portable wireless device is the “telephone 100”. The attempt to compare the part of a printer of Larsson to the claimed portable wireless device that wireless communicates with the reference fails to give the term in the reference or the claim their ordinary meaning.

B. The Examiner’s Assertion that it Would be Obvious to Make the Communication Devices 300 of Larsson Portable is Unsupported by the Reference.

The theory of the rejection (December 13, 2005 Office Action, ¶69) seems to be that it would be obvious to make the “communication devices 300” portable. This is also not supported by the reference. The communication devices 300 in Larsson “are connecting printers 380 to the network 10”. They may be external, internal or embedded. P13, L 23-33. As there is a one to one correspondence between the “communication devices 300” and the printers in Larsson (each printer has one, see FIGs. 1-4) there is no need to “change the location of the wireless device” as submitted by the Examiner (December 13, 2005 Office Action, ¶69).

C. The Examiner's Interpretation of Larsson to Reject Claim 37 is Improper, as the Cited Communication Device in Larsson is Not Disclosed to Identify the Location of Print Content to the Print Service, as Defined In the Claim.


Even with the stretched interpretation of Larsson, however, claim 37 is not met or suggested. Claim 37 further requires causing "the first communication interface to communicate a reference that identifies the location of a print content to the print service." The Examiner submits (December 13, 2005 Office Action, ¶168) that the "communication device 300" communicates with a "print service 60" in Larsson. Item 60 in Larsson is a "company 60 for serving company documents to employees" (P15, L7). The only "print service" in Larsson is attached to the "ISPs 200" (FIGs. 1-4). This "print service device 210" may address the "print file" to the "communication device 300" (P15, L27-28), but there is nothing indicating that the communication device 300 "identifies the location of print content to the print service" as required by claim 37.

CONCLUSION

For the above reasons, Applicant requests the Board to reverse the outstanding rejections. The case should be permitted to pass to allowance.

Respectfully submitted,
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CLAIMS APPENDIX

1-3. (Canceled)

4. A computer program product comprising a computer readable code stored on a computer readable medium that, when executed by a computer, causes the computer to:

wirelessly communicate a reference to a print device, the reference identifying a location at which a print content is located on a network, wherein the reference causes the print device to retrieve the print content from the network and to print the print content, wherein the reference further comprises billing data.

5. A computer program product comprising a computer readable code stored on a computer readable medium that, when executed by a computer, causes the computer to:

wirelessly communicate a reference to a print device, the reference identifying a location at which a print content is located on a network and the location of a print service, wherein the reference causes the print device to retrieve the print content from the network and to print the print content,

wherein the reference causes the print device to retrieve the print content from the network by causing the print device to supply the reference to the print service, which is adapted to retrieve the print content from the network and further adapted to format the retrieved print content for printing.

6-8. (Canceled)

9. A computer program product comprising a computer readable code stored on a computer readable medium that, when executed by a computer, causes the computer to:

wirelessly communicate a reference to a print device, the reference identifying a location at which a print content is located on a network, wherein the reference causes the print device to retrieve the print content from the network and to print the print content,

wherein the computer readable code further causes the computer to:

wirelessly communicate a security access code to the print device.

10. The computer program product of claim 9, wherein the security access code enables usage of the print device.

11. The computer program product of claim 9, wherein the security access code enables access to the print content.

12. The computer program product of claim 9, wherein the computer readable code further causes the computer to wirelessly communicate the security access code in response to a security challenge received from the print device.

13-14. (Canceled)

15. A computer program product comprising a computer readable code stored on a computer readable medium that, when executed by a computer, causes the computer to:

wirelessly communicate a reference to a print device, the reference identifying a location at which a print content is located on a network, wherein the reference causes the print device to retrieve the print content from the network and to print the print content,

wherein the computer readable code further causes the computer to:
wirelessly communicate a discovery signal to the print device
wherein the print device has one or more print capabilities and wherein the responsive signal further identifies one or more of the print capabilities of the print device.

16-17. (Canceled)

18. A computer program product comprising a computer readable code stored on a computer readable medium that, when executed by a computer, causes the computer to:

wirelessly communicate a reference to a print device, the reference identifying a location at which a print content is located on a network, wherein the reference causes the print device to retrieve the print content from the network and to print the print content,

wherein the computer readable code further causes the computer to add information to the reference before wirelessly communicating the reference to the print device,

wherein the information added to the reference comprises a locator, the locator identifying a location of a print service.

19. A computer program product comprising a computer readable code stored on a computer readable medium that, when executed by a computer, causes the computer to:

wirelessly communicate a reference to a print device, the reference identifying a location at which a print content is located on a network, wherein the reference causes the print device to retrieve the print content from the network and to print the print content,

wherein the computer readable code further causes the computer to add information to the reference before wirelessly communicating the reference to the print device,

wherein the information added to the reference comprises a security access code.

20. A computer program product comprising a computer readable code stored on a computer readable medium that, when executed by a computer, causes the computer to:

wirelessly communicate a reference to a print device, the reference identifying a location at which a print content is located on a network, wherein the reference causes the print device to retrieve the print content from the network and to print the print content,

wherein the computer readable code further causes the computer to add information to the reference before wirelessly communicating the reference to the print device,

wherein the information added to the reference comprises billing information.

21. (Canceled)

22. A computer program product comprising a computer readable code stored on a computer readable medium that, when executed by a computer, causes the computer to:

wirelessly communicate a reference to a print device, the reference identifying a location at which a print content is located on a network, wherein the reference causes the print device to retrieve the print content from the network and to print the print content,

wherein the computer readable code further causes the computer to add information to the reference before wirelessly communicating the reference to the print device,

wherein the computer readable code further causes the computer to:
communicate a request for status information to the print device; and,
receive status information from the print device.

23-31. (Canceled)

32. A portable wireless device comprising:
a communication interface adapted to enable wireless communication between the portable wireless device and a print device; and,
a processor coupled to the communication interface, the processor being adapted to cause the communication interface to wirelessly communicate a reference to the print device, wherein the reference identifies the location of a print content on a network, and wherein the reference causes the print device to use the reference to retrieve the print content from the network and further causes the print device to print the print content,
wherein the processor is further adapted to cause the communication interface to communicate a security access code to the print device.

33. The portable wireless device of claim 32, wherein the security access code enables usage of the print device.

34. The portable wireless device of claim 32, wherein the security access code enables access to the print content.

35-36. (Canceled)

37. A portable wireless device comprising:

a first communication interface adapted to enable communication between the portable wireless device and a print service;

a second communication interface adapted to enable wireless communication between the portable wireless device and a print device; and,

a processor coupled to the first communication interface, the processor being adapted to cause the first communication interface to communicate a reference that identifies the location of a print content to the print service, wherein communicating the reference to the print service causes the print service to retrieve the print content from a network and further causes the print service to transmit the print content to the portable wireless device.

38. The portable wireless device of claim 37, wherein communicating the reference to the print service further causes the print service to format the print content for printing before transmitting the print content to the portable wireless device.

39. The portable wireless device of claim 38, wherein the processor is further coupled to the second communication interface and wherein the processor is further adapted to cause the second communication interface to transmit the print content to the print device for printing.

EVIDENCE APPENDIX

(None)

RELATED PROCEEDINGS APPENDIX

(None)

CERTIFICATE OF SERVICE

(None)

(This is not a reexam proceeding and none is required)